

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

January 27, 2014

Via ECF

Hon. Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Reynold Maragni et al., 11-Cr-30

Dear Judge Matsumoto:

This office represents the defendant Reynold Maragni in the above-captioned case. Mr. Maragni is scheduled to be sentenced on Monday, March 10, 2014. I write with respect to the briefing schedule for sentencing.

Your honor previously set a schedule in which the defendant's sentencing memo would be due first, followed by the government's submission and a reply. However, after careful consultation with assigned assistant United States attorney Elizabeth Geddes, the parties jointly propose that the government file its memorandum, which is expected to be a motion pursuant to USSG 5K1.1, first, with the defendant's sentencing memorandum due afterward. This proposed sequence will afford the defendant an opportunity to respond to the government's sentencing submission in a timely fashion.

Therefore, consistent with the dates previously set by the court, the parties jointly propose the government's submission be filed by Tuesday, February 4, 2014 and the

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defendant's submission be filed by February 17, 2014. This proposed schedule will not affect the sentencing date.

Thank you for your attention to this case.

Very truly yours,



Zachary Margulis-Ohnuma